

FILED

JUN 21 2023

**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARK ROBINSON,

Defendant.

4:23CR330 RLW/JMB

INDICTMENT

COUNT I

The Grand Jury charges that:

On or about April 13, 2023, in St. Louis County, within the Eastern District of Missouri,

MARK ROBINSON,

the defendant herein, did knowingly and intentionally distribute fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT 2

The Grand Jury further charges that:

On or about April 20, 2023, in the City of St. Louis, within the Eastern District of Missouri,

MARK ROBINSON,

the defendant herein, did knowingly and intentionally distribute fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and punishable under

Title 21, United States Code, Section 841(b)(1)(C).

COUNT 3

The Grand Jury further charges that:

On or about April 27, 2023, in St. Louis County, within the Eastern District of Missouri,

MARK ROBINSON,

the defendant herein, did knowingly and intentionally distribute fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT 4

The Grand Jury further charges that:

On or about May 4, 2023, in St. Louis County, within the Eastern District of Missouri,

MARK ROBINSON,

the defendant herein, did knowingly and intentionally distribute fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

FORFEITURE ALLEGATION

The Grand Jury further finds probable cause that:

1. Pursuant to Title 21, United States Code, Section 853(a), upon conviction of an offense in violation of Title 21, United States Code, Section 841(a)(1) as set forth in Counts 1, 2, 3, and/or 4, the defendant, **MARK ROBINSON**, shall forfeit to the United States of America any property, constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of such violation/s and any property used, or intended to be used, in any manner or part to commit or to facilitate the commission of such violations.

2. Subject to forfeiture upon a conviction of Counts 1, 2, 3, and/or 4 is a sum of money equal to the total property constituting, or derived from, any proceeds obtained directly or indirectly as a result of such violations.

3. The specific property subject to forfeiture includes, but is not limited to, the following:

a. Twenty-four thousand, four hundred and nine dollars (\$24,409.00) in United States Currency located and seized by law enforcement from 4372 Casa Brazilia Dr., St. Louis, MO 63129, Building 1152, Apartment L, on or about May 17, 2023.

4. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

Jerome McDonald, #63412MO
Assistant United States Attorney